

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

MELODY J. ROSE,

Plaintiff,

Case No. 09-CV-142

v.

**STEVEN M. CAHEE, M.D.,
FOND DU LAC REGIONAL CLINIC, S.C., and
AGNESIAN HEALTHCARE, INC.**

Defendants.

NOTICE OF MOTION AND MOTION TO FILE DOCUMENTS UNDER SEAL

PLEASE TAKE NOTICE that pursuant to Civil Local Rule 79.4(c), Plaintiff Melody J. Rose by her attorneys, will move the Court, at the United States Courthouse for the Eastern District of Wisconsin, 517 East Wisconsin Avenue, Milwaukee, Wisconsin, 53202, at a date and time set by the Court, for documents associated with Plaintiff's Opposition to Defendant Steven M. Cahee, M.D., and Fond du Lac Regional Clinic, S.C.'s Motion for Summary Judgment, to be filed under seal.

The documents which Plaintiff seeks to file under seal are (1) Plaintiff's Brief in Opposition to Motion for Summary Judgment on Behalf of Defendants Steven M. Cahee, M.D., and Fond du Lac Regional Clinic, S.C.; (2) Plaintiff's Responses to Defendants Steven M. Cahee, M.D., and Fond du Lac Regional Clinic, S.C.'s Proposed Findings of Fact; (3) Plaintiff's Additional Propositions of Fact in Opposition to Motion for Summary Judgment on Behalf of Defendants Steven M. Cahee, M.D., and Fond du Lac Regional Clinic, S.C.; (4) Declaration of Scott A. Schoettes in Opposition to Motion for Summary Judgment on Behalf of Defendants Steven M. Cahee, M.D., and Fond du Lac Regional Clinic, S.C., with exhibits; and (5)

Declaration of Melody J. Rose in Opposition to Motion for Summary Judgment on Behalf of Defendants Steven M. Cahee, M.D., and Fond du Lac Regional Clinic, S.C, with exhibit.

The documents sought to be filed under seal refer to, discuss, and/or attach documents or information designated Confidential by Defendants pursuant to the Stipulated Discovery Confidentiality Order entered on May 5, 2009. (Docket No. 21.) This motion is further supported by the Plaintiff's Memorandum of Law in Support of Her Motion to File Documents Under Seal, filed herewith.

January 21, 2010

s/ Kathryn S. Devine

Kathryn S. Devine, Ill. Bar No. 6286033 Attorney for Plaintiff Melody J. Rose Schiff Hardin LLP 233 South Wacker Drive Suite 6600 Chicago, IL 60606 (312) 258-5500 (tel.); (312) 258-5600 (fax) Email: kdevine@schiffhardin.com	Scott A. Schoettes, Ill. Bar No. 6282105 Bebe J. Anderson, NY Bar No. 1795327 Attorney for Plaintiff Melody J. Rose Lambda Legal Defense & Education Fund, Inc. 11 East Adams, Suite 1008 Chicago, IL 60603-6303 (312) 663-4413 (tel.); (312) 663-4307 (fax) Email: sschoettes@lambdalegal.org Email: banderson@lambdalegal.org
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CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2010, I electronically filed the Notice of Motion and Motion to File Documents Under Seal, Plaintiff's Memorandum of Law in Support of Her Motion to File Documents Under Seal, and Declaration of Nina Knierim in Support of Plaintiff Melody J. Rose's Motion to File Document Under Seal with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Rebekah Kopec-Farrell
Attorney for Plaintiff Melody J. Rose

Laurie J. Mcelroy
Attorney for Agnesian Healthcare, Inc.

Neal S. Krokosky
Attorney for Agnesian Healthcare, Inc.

Terri L. Weber
Attorney for Steven M. Cahee, M.D. and Fond du Lac Regional Clinic, S.C.

William R. Wick
Attorney for Steven M. Cahee, M.D. and Fond du Lac Regional Clinic, S.C.

s/ Kathryn S. Devine
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